FILED IN CLERK'S OFFICE
U.S.D.C. Atlanta

JUL 31 2017

JAMES N. HATTEN, Clerk

By: Deputy Clerk

INTHE NORTHERN DISTRICT OF GEORGIA STATE OF GEORGIA

NADINE MARIE JACKSON-RONE Petitioner		Fig.
Vs	CIVIL ACTIOIN	
LONG BEACH MORTGAGE COMP DEUTSCHE BANK NATIONAL TRU	PANY, File No.:	i de
AS TRUSTEE FOR LONG BEACH I LOAN TRUST 2006-6,	MORTGAGE	_
JPMORGAN CHASE BANK NATIONAL ASSOCIATION	1:17-CV	-2883
Defendants.	1.1/ 01	

COMPLAINT FOR FRAUD, QUIET
TITLE, WRONGFUL INSTITUTION OF
NON-JUDICIAL FORECLOSURE,
INJUNCTIVE RELIEF,
COMPENSATORY AND PUNITIVE
DAMAGES.

COMES NOW, Nadine Marie Jackson-Rone, and files this her
"COMPLAINT, FRAUD, QUIET TITLE, WRONGFUL
INSTITUTION OF NON-JUDICIAL FORECLOSURE, INJUNCTIVE
RELIEF, COMPENSATORY AND PUNITIVE DAMAGES," showing

this Honorable Court as follows:

PARTIES AND JURISDICTION

1.

Defendant LONG BEACH MORTGAGE COMPANY (hereinafter "LONG BEACH") is a proper party, and is subject to the jurisdiction and venue of this Court.

Defendant DEUTSCHE BANK NATIONAL TRUST CO {hereinafter "DEUTSCHE") is a proper party, and is subject to the jurisdiction and venue of this Court.

3.

Defendant JPMORGAN CHASE BANK, NATIONAL ASSOCIATION (hereinafter "CHASE BANK") is a proper party, and is subject to the jurisdiction and venue of this Court.

4.

On May, 1, 2006 Anthony Leon Rone (Plaintiff's husband) executed a Security Deed in favor of Defendant Long Beach Mortgage Co. (recorded at Deed Book 3607, Book 284 and again at page 306) for the then-couple's residence situated at 5560 Fisherman Court, Villa Rica, Carrol County, Ga.. Copy attached hereto as Exhibit "A-1 and A-2".

5.

On June 15, 2006 Anthony Leon Rone (Plaintiff's husband) executed a Quitclaim Deed in favor of Plaintiff Nadine Marie Jackson-Rone (recorded at Deed Book 3728, Page 212) for that certain property. Copy attached hereto as Exhibit "B"

On July 16, 2008 Defendant Long Beach Mortgage Co transferred sold, assigned to Defendant Deutsche Bank National Trust Co. as Trustee for Long Beach Mortgage Loan Trust 2006-6 in and to the Security Deed executed by Anthony Leon Rone to Defendant Long Beach Mortgage Co. dated May 1, 2006 for said property Copy attached hereto as Exhibit"C"

7.

On November 10, 2014 Defendant JPMorgan Chase Bank, National Association, successor in Interest by Purchase from FDIC as Receiver of Washington Mutual Bank Successor in Interest to Defendant Long Beach Mortgage Company, the holder of a certain Security Deed between Anthony Leon Rone to Defendant Long Beach Mortgage Co. executed a CANCELLATION OF DEED TO SECURE DEBT (recorded at Deed Book 5365, Page 907). Copy attached hereto as Exhibit "D"

8.

Defendant Long Beach Mortgage Co. has withdrawn its registration and may therefore be served with process through the Georgia Secretary of State Corporations Division 2 MLK Dive, Atlanta, Ga. 30303.

Defindes for eclased on 5559 Fishermo Court, VIIIa Rica, GA property while was put in fall. See EXE.

Defendant **DEUTSCHE.** may be served with process at 725 Baymeadows Way, Jacksonville, Fl 32256

10.

Defendant JP Morgan Chase Banc. may be served with process through it's counsel John D. Fichtner, Esq., McCalla Raymer, LLC, 1544 Old Alabama Road Roswell, Ga. 30076

INTRODUCTION

11.

Plaintiff brings this Complaint pursuant to 0. C.G.A. 9-4-1, et seq., Uniform Superior Court Rule 6. 7, and O.C.G.A. 9-11-65) against the named defendants.

12.

Specifically, plaintiff seeks injunctive relief for the return of her properties as 5559 Fisherman Court, Villa Rica, Georgia 30180 and her primary residence at 5560 Fisherman Court, Villa Rica, Georgia 30180.

STATEMENT OF

FACTS 13.

Plaintiff show that there is an actual controversy with the defendants relative to his primary residence situated at 5560 Fisherman Ct., Villa Rica, Ga 30180.

On May,1, 2006 Anthony Leon Rone (Plaintiffs husband) executed a Security Deed in favor of Defendant Long Beach Mortgage Co. (recorded at Deed Book 3607, Book 284 and again at page 306) for the then-couple's residence situated at 5560 Fisherman Court, Villa Rica, Carrol County, Ga...

15.

On June 15, 2006 Anthony Leon Rone (Plaintiff's - husband) executed a Quitclaim Deed in favor of Plaintiff Nadine Marie Jackson-Rone (recorded at Deed Book 3728, Page 212) for that certain property

16.

On July 16, 2008 Defendant Long Beach Mortgage Co transferred s o l d, assigned to Defendant Deutsche Bank National Trust Co. as Trustee for Long Beach Mortgage Loan Trust 2006-6 in and to the Security Deed executed by Anthony Leon Rone to Defendant Long Beach Mortgage Co. dated May I, 2006 for said property

17.

On November 10, 2014 Defendant JPMorgan Chase Bank, National Association, successor in Interest by Purchase from FDIC as Receiver of Washington Mutual Bank Successor in Interest to Defendant Long Beach

Mortgage Company, the holder of a certain Security Deed between Anthony

Leon Rone to Defendant Long Beach Mortgage Co. executed a

CANCELLATION OF DEED TO SECURE DEBT (recorded at Deed Book 5365, Page 907)

18.

On November 12, 2014 Defendant JPMorgan Chase Bank (through their counsel McCalla Rahmer, LLC) forwarded its letter asserting that it intended to conduct a Non-Judicial Foreclosure upon plaintiff's property on the first Tuesday of January, 2015.

19.

On May 4, 2015 Plaintiff filed bankruptcy through

her private attorney see EX F.

COUNT 1

FRAUD

20.

Plaintiff re-alleges the allegations contained in the preceding paragraphs and incorporates same by reference into this Count.

21.

On May,l, 2006 Anthony Leon Rone (Plaintiff's '1.usband) executed a Security Deeds at Defendant Long Beach Mortgage Co.'s attorney (Patton & Fletcher, LLC for which said attorneys subsequently recorded at Deed Book 3607, Book 284 and again at page 306 for the then-couple's residence situated at 5560

Fisherman Court, Villa Rica, Carrol County, Ga..

22.

Thereafter, or on June 15, 2006 Anthony Leon Rone (Plaintiffs husband) executed a Quitclaim Deed in favor of Plaintiff Nadine Marie Jackson-Rone (recorded at Deed Book 3728, Page 212) for that certain property.

23.

On July 16, 2008 Defendant Long Beach Mortgage Co transferred sold, assigned to Defendant Deutsche Bank National Trust Co. as Trustee for Long Beach Mortgage Loan Trust 2006-6 in and to the Security Deed executed by Anthony Leon Rone to Defendant Long Beach Mortgage Co. dated May 1, 2006 for said property

4.

Then on November I 0, 2014 Defendant JPMorgan Chase Bank, National
Association, successor in Interest by Purchase from FDIC as Receiver of
Washington Mutual Bank Successor in Interest to Defendant Long Beach
Mortgage Company, the holder of a certain Security Deed between Anthony Leon

Rone to Defendant Long Beach Mortgage Co. **EXECUTED**

CANCELLATION OF DEED TOSECURE DEST(recorded at Deed

Book 5365, Page 907) but now seeks to foreclose upon that very same property.

25.

Said transaction was fraudulent and plaintiff was defrauded.

Despite the deed cancellation, Defendants have sought to foreclose.

27.

As a direct and proximate result of Defendants fraudulent actions set forth above, plaintiff has been damaged, including the potential loss of her home after foreclosing her equity, financial damage, damage to her credit and credit standing and other damages.

28.

The actions of the Defendants by creating, using and perpetratinfraud against Plaintiff and against the public by recording these documents in

the public records, which conduct shocks the conscience under these circumstances, entitles plaintiff to punitive damages.

WRONGFUL INSTITUTION OF NON-JUDICIAL FORECLOSURE PROCEEDING

29.

Plaintiff re-alleges the allegations contained in the preceding paragraphs and incorporates same by reference into this Count.

30.

Defendants have transmitted certain instruments / letters, etc... expressing its intent to foreclose upon plaintiff's property in addition to advertising such property in the local legal organ.

31.

The non-judicial foreclosure attempts, including the act of advertising was wrongful.

32.

Defendants actions, in disregard of plaintiff's rights, which conduct shocks the conscience, under these circumstances, entitles Plaintiff to punitive damages.

33.

AS a direct and proximate result of the actions of Defendant, plaintiff has been damaged including potential loss of her home, her equity therein, financial damage,

loss of use and enjoyment of this property, damage to her credit and credit

standing, emotional distress and other damages as well.

COUNT III

COMPENSATORY AND PUNITIVE DAMAGES

34.

Plaintiff's incorporate by specific reference thereto, replead and reallege in relevant parts, paragraphs listed aboves if fully alleged over again hereunder.

35.

Pursuant to O.C.G.A. 16-14-4 and 16-14-6 Plaintiff should be awarded three times the actual damages sustained.

36.

Pursuant to O.C.G.A. 16-14-4 and 16-14-6 Plaintiff should be awarded punitive damages. Plaintiff is entitled to compensatory damages due to her lost and homelessness.

37.

Plaintiff suffered a massive heart attack due to the stresses of illegal foreclosure. Her illness caused massive irreversible health problems which she should be compensated for. Plaintiff has been indigent due to homelessness and

severe health problems as a result of health problems and harassment. She was only given six hours to vacate the premises. Plaintiff lost a lot of personal property as well as her boat.

It is clear and convincing evidence that Defendants actions demonstrate willful misconduct, malice, fraud, wantonness, oppression and an entire want of care as will raise a presumption of conscious indifference to the consequences of Defendant's orchestrated and fraudulent actions directed at plaintiffs.

WHEREFORE, Plaintiffs prays as follows:

- a) That Plaintiff have a trial upon the issues formed in this C o m p l a i n t.
- b) That the Court inquire into this matter and provide judgment for plaintiff's torts, including fraud, injunctive relief, quiet title compensatory and punitive damages; and
- c) That the Court Order any and all such other relief it deems appropriate.

This 3/4 of July, 2017

JACQUELINE A. GIBSON & ASOCIATES P.C.

Jacqueline A. Gibson, Esc Attorney for Plaintiff

GA BAR 292925

235 Peachtree Street N.E, Suite 400

Atlanta, Georgia 30303

(404) 681-1200

(404) 344-3094 Fax

Judgegibson2003@yahoo.com

Results To:
LONG BEACH MORTGAGE COMPANY QUENCOF BUFFERION COARM
P.O. BOX 201685
STOCKTON, CA 95202

NATIONA ST. STORES

TO PRESENTE STORES

TO PRE

DEFINITIONS

Words used in multiple sections of this document are defined below and other words are defined in Sections I, 11, 13, 18, 20 and 21. Certain rules regarding the usage of words used in this document are also provided in Section 16.

SECURITY DEEL

(A) "Security Instrument" means this document, which is dated together with all Riders to this document.

i lay

, 2006

together with all Kiders to this document.
(B) "Betrower"is

ANTHONY LIBON RONE, A SINGLE MAN

Borrower is the granter under this Security Instrument.
(C) "Leader"is LONG BEACH MORTGAGE COMPANY

Lender is a corporation organized and existing under the laws of the State of Delaware

GEORGIA-Sincle Family-Formula ManuFredella Mac UNIFORM MISTRIMIENT

Form 3011 1/01

-ciari trester

-ML

ر،

VMP NONTERGE PORMS - HERMOT - 279*

Case 1:17-cv-02883-WSD Document 3 Filed 08/03/17 Page 13 of 23

73422

BX

PG

3607 306

PARTIES 1

2014 DEC 26

子

14:43

CLERK SI

I L CHUSTY CEORGIA

GA. CARROLL COUNTY

GEORGIA INTANGIBLE TAX PER 175, 50 6/23/00

CHECK OF SECRETARY COUNTY

06 JUN 23 MKIN 12

After Recordation Return to:

LONG BEACH MORTIGAGE COMPANY P.O. BOX 201005

Louis No. 472/424-7863

SECURITY DEED

THIS DEED is made this

tet.

ry of Mari

2008 , between the Granto

ANTHONY LEON SIONEL A SINGLE MAN

(hereix "Barrower"), and the Grantee,

LONG BEACH MORTGAGE COMPANY

eximing under the laws of the State of Delevers 1400 S. DOUGLASS RD., SUITE 198, AMANESIA, CA \$2004 , a corporation organized and , whose address is

(formin *1 ander*)

TO SECURE to Lender the repayment of the indebtodness evidenced by the Note, with interest thereoer, the payment of all other squar, with interest thereoer, advanced in accordance herewith to protect the so active of this Dead to Secure Debt; and the performance of the covernant and agreements of Boscower herein contained, Boscower to does hereby grount and control to Londer and Lender's ancessees and assigns, with power of onle, the following does local property located in the County of GARMOLL.

State of Georgia:

LEGAL DESCRIPTION ATTACHED HERETO AND MAKE A PART HEREOF

which has the address of VILLA RICA SSEC FIRMERICAN CT

(City) Georgia 3018

[20 Code] (Increin "Property Address"

TO BAVE AND TO HOLD such property wate Londer and Londer's successing and assigns forever, together with all the improvements now or increding concludes the property, and all communics, sights, against the remains a past of the property covered by this Dank; and all of the property together with said property (or the leasthaid country if this Dank is on a longitudine benchmain referred to as the "Pi quety."

Becomes covenants that Becomes is landfully select of the estate heavily ourselved and has the eight to great and convey the Property, and that the Property is unconstricted, except for accommon of a land. Becomes covenants that Decrements and will defined according the thirt to the Property against all chains and done into adjust to encumbrances of record.

GEDROIA- SECONOMORTSAGE - 100 - FINNAPHUNC UNIFORM INSTRUMENT

-talovi min

TH.

VIP SICHTONICE POINTS - projekt - 7207

TOGRANO: INSTRUMEN

7631		372	3 212		. 1	
Γ	1	CAMPOL COUNTY, O	7069 BIRGHA ERTAX	GA CATANATI COUNTY CLERK SUPERIOR COUNTY 06 OCT -5 ANIO 42	LIGHT SUPERIOR COURT	
L	١.	Sparing Af	NAME OF THE PERSON OF THE PERS	GA CATE	S HELDER	_
It required by your jurisdiction		Space Reserved for Recording diseas of: 1) where to return this !	Hi i; 2) préparer; 3) party	requesting recording.]		
Date of this Document:	June 15	2006		. 201 00000	2.0€	CLERKCO 2014 DEC 26 PM 4: 4
Reference Humber of Any		5xhilit-A		• •	REPRESENTATION OF THE PROPERTY	ERKZ014 DEC
Grantor: Name Street Address City/State/Zip	hony ke on fisher o Rich	ean Rope			KROLL CHUNTY GEORGIA	26 PH 4
Grantee: Nome Street Address City/State/Zip	dine Maci	ne Tockson opro Deine 64, 30180			> -	COURT .
Abbreviated Legal Description on the name:	ATTO	Exhibit	KA)	unit, building and	•	
THIS OUTCLAND DEED.		day	Jur			
20 Die by flest party, G	DIA TOPE	A POCK SOO	Villa Kies Carre Lydla Ks	3-1-		
Dollars K. Y. (XXX)	settle st المُعْمَدُ المُعْمَدُ المُعْمَدُ المُعْمَدُ المُعْمَدُ المُعْمَدُ المُعْمَدُ المُعْمَدُ ا	consideration and for the sun aid second party, the receipt one he said second party forever, i	o Gantal	20USpood) . <u>.</u>	
www.polestrans	}	Page 1 of 2		© 2005 Secures Media, <u>LCC</u> USBN-1 = Pec. USANS		
	f					

3K

3728 213

thereto in the County of to wit:			Stu te rif	engia
IN WITHERS WHITEDF, d scaled and delivered in the		ned and scaled these	presents he day and y	ser first written above. Signer
Signature of Witness		LAN Car	<u> </u>	,
Print Name of Witness	Sameen	b M. C	4	•
Signature of Witness	- SINKLA	1) 90/1	/	
Print Name of Witness	Actob	M. U.S	+	•
.	O(Z)			•
Signature of Grantor Print Name of Grantor	Mari	and the	Rove	
Link Diffic At Clauds			Zerz Z	
compoi the for	<u> </u>			
m June 15, 2	006 be	fore me	de AL 21	off
ppeared Anthony	Lean Barre	d	personal	y known to me (or proved albed to the within
istrument and admovied	and to me that he/sho	ithey executed the co	ب خوالایم آل باز برا می	And hadrane hardwarter
nd that by his/her/their si erson(s) acted, executed t	mature(s) on the instr	ument the person(s),	or the entity upon be	half of which the
KINESS An bond and rid		1		
THE T	71-91/1	1		
drawner of Notary	1000	-	V	
,				
Sent Known	Produced ID	4		
pe of iD <u>(gr. Dojat.</u> (Seeil)	elune	Library	6 _//	
• • • • • • • • • • • • • • • • • • •		1		
		"A A		

ROLL COUNTY

2014 DEC 26 PM 4: 43

Page 2 of 2

4520-1 - Unif 8002

. BK , PG 3728 214

EXHIBIT A

A certain tract or percel of land in Carroli County, in the state of Georgia, described as follows:

All that tract or percet of land lying and being in Land Luxis 31 and 32 of the 6th Clientet of Carroll County, Georgia, containing 0.33 across, more or less, and being more particularly described as Lot 560, Section 4. Febriald Plantation, as shown on a plat entitled "Survey for Kelly R. Brothers and Violde W. Brothers", prepared by Geocon Surveying, Inc., certified by Henry 1. McDrayer, Georgia Registered Land Surveyor No. 2570, dated November 181, 1995, and recorded at Plat Book 55, page 23, Carroll County Public Records. Eleid plat and the record thereof are each by reference incorporated herein.

ERK COUNTY

2014 DEC 26 PM 4: 43

2014 DEC 26 PM 6: 43

CARREL COUNTY GEORGIA

CARREL COUNTY GEORGIA

OCT 0 6 2006
RECORDED JOSE ETH SKONNER, CLERK

192665

4412 327

Our File No.: 11563408-FT1 Debtor: Authory Leon Rone Sale Dute: 10/07/2006

1544 Old Alab (A) R mell, GA 30076

ASSIGNMENT

STATEOF NUMBER COUNTY OF DADICA

For value received, Long Beach Mertgage Company has this day true thirred, sold, assigned, conveyed a set over to Destache Bank National Treat Company, as Trustee for Long Beach histograph Loan Treat 2006-6, wh address is 7255 Bayeseadoure Way, Jacksonville, FL 32256, as Assigned, its appropriately representatives and assignable to the special interest in each to a certain Security Deed (or Deed to Survey Dobt) consents by Authory Los Hone to Long Beach MChtgage Company, dated May 1, 2006, recorded in Dec & Sock 3607, Page 254, Carrell County, Georgie Records.

Property Address: 5560 Fisherman Ct, Villa Rice, GA 30180

The Assigner havin specifically transfers, sells, conveys and assigns (s) the above Assigns materives and susigns, the afformald Security Dovd, the property described discrete, the indules by together with all the powers, options, privileges and immunities therein, si intelined.

The Assignor brevin has this day sold and assigned to the Assignor has the note someted by the aftersaid. Security Doef and this transfer is made to secure the Assignor, he successors, at presentatives and sesigns, in the payment of sold note.

ACQUELYN FREEMAI MUNNYRAUG-MINESON

DCT 1 7 2008 RECORDED KENNETH SKINNER, CLERK

CANKALL CHAINLA GEORGIA

2014 DEC 26

꽃

FILED GA. CARROLL COUNTY

BK

PG

907 -5365



Recorded Return To: yan Chase Bank, N.A. ationwide Title Clearing, Inc. 2100 Akt. 19 North Paim Harbor, FL 34683 Loss #: 0698080975

ä

CANCELLATION OF DEED TO SECURE DEBT

(Cancellation of Security Deed)

STATE OF GEORGIA COUNTY OF CARROLL

COUNTY OF CARROLL
KNOW ALL MEN BY THESE PERSENTS, And IPMORGAN; CRASE BANK, NATIONAL
LISSOCIATION, SUCCESSOR IN INTEREST BY PURCHASE FILOM THE FEDERAL DEPOSIT
NEURANCE COSPORATION AS RECEIVER OF WASHINGTON BUILDIAL BANK SUCCESSOR IN
NTEREST TO LONG BEACH MORTGAGE COMPANY the holder of a provide Seasiny Leod exaconed by
INTERONY LEON BURNE to LONG SEACH MORTGAGE COMPANY thete OSCIUZUOS. Recorded in
1004 307, Page 305, of the official receive, in the office of the Clerk of Seignifor Court of Carroll County,
100715, hereby authorizes and directs the Clerk of Suprifor Court to cancel the dead of record as provided in
1006 3604 1444 of the O.C.G.A. for other mortgage cancellations.
1007 POPULATION OF THE SEIGNIF OF THE SE

PRESIDENT

ASST. SECRETARY

DE MOC MINING GOTT

CUACHTI PRIBH LOUISIANA

LIFETINE COMMISSION

MODERY D # 08388

ry Public - State of LOUISIANA

e expirer LIFETIME

Document Prepared By: E.L. Lucci/NTC, 2160 Alt. 19 North, Pa CHAS6 24689503 _5 WAMU T0714112212 [C-1] SPOGAS Harbor, F. 34683 (200)346-9152

D0000: 5321 !

RECORDED

NOV 18 2014

Ming. Lat. Chile

2014 DEC 26 呈 4:43

ook 4200. Page 286

63406 BK PG	Bk 13
Nading Maria Jackson Heal Estate Transfer Tax 100 100 100 100 100 100 100 100 100 10	DB JAN -4 FM 2: 21 Framedic Myss. CHERK SUPERIOR GOUNT
Above Space Reserved for Recording	din 1
If required by your jurisdiction, list above the name & address of: 1) where to return this form; 2) preparer; 3) party requesting reco- Quitclaim. Deed	
Date of this Dogument: Tankary 4 . 2008 /	Lett (Pagener)(II)
Reference Number of Any Related Documents: FXhibit "A" (Book 360.7-) Reference Number of Any Related Documents: FXhibit "A" (Book 360.7-)	•
Grantor:	
Name Anthony Leon Rone	<u> </u>
Street Address 5540 Higherman Court City/State/Zip VIII & RICO, 64, 30180	
Grantee:	
Name NadineMarie Jackson-Rome	
Street Address 5.360 Fisher man Could City/State/Zip VIII Rica GA, 30180	
Abbreviated Legal Description fi.e., lot, block, plat or section, township, range, quarter/quarter, or not), building condo name): A Hoched See EXPLOIT 4.0	85
Assessor's Property Tax Parcel/Account Number(s): See Exhibit "A" Subm	itled.
THE OUTSIAN OFFI	P\$q1030FX88Y
THIS QUITCLAIM DEED, executed this disy of January Grantor, ANTHONY Lean Rome	whose
mailing address is 5000 hoheeman and vila ling At, 3080 second party, Grantee, Mainemanie Jackson-Rone	2_ to
whose mailing address is 25160 Fisheleman Courty All Ring 67, 3018 WITNESSETH that the said first party, for good consideration and for the sum of Figure 7715 Che. I	Many
Dollars (\$ - 1+1212) paid by the said second party, the receipt whereof it hereby acknowledgeds	ALL ALLE
loter y the block described and passes and cultidaim unto the said second party forever, all the right, title, interest and daily commission Expirer Aug. 18, 2008	40749 ME
Page 1012 Oxisting 1970	Caric Ja
7020 S. Kullo DA-FE 1-4-2008	MOTAD IN THE STATE OF THE STATE

CERTIFIED
CO.PY

DEPUTY CHESCHOOL COURT CHESCHOOL CHESCH

Case 1:17-cv-02883-WSD Document 3 Filed 08/03/17 Page 20 of 23

ook 4200 Page 287

BK PG 287 44200 which the said first paint thereto in the County of , State of to wit: "ነ'ለብ TRUCOUNT RESERVE . area.k IN WITNESS WHEREOF, the said first party has signed and sealed these presents the day and year first written above. Signed, sealed and delivered in the presence of: Signature of Witness Print Name of Witness Signature of Witness Print Name of Witness Signature of Grantor Print Name of Grantor State of County of before me. appeared Hoding Annah Learn 19 no - Lasting star Rend personally known to me (or reto me on the basis of satisfactory evidence) to be the personally whose name(s) is/are subscribed to the within personally known to me (or proved instrument and acknowledged to me that heisheithey executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument. WITNESS my hand and official seal Signature of Notary and Hilling Affiant, Produced ID. Known Type of ID Deivers License ADBIT TO SEE CONT. (Seal)

Notary Public Douglas County, Georgia My Commission Expires Aug. 18, 2008

Bk 136 Pg 385

ook 4200 Page 288

BK PG 4200 288

ВK 3607 283 **EXHIBIT FART**

ALL THAT TRACT or parcel of land lying and being in Land Lors 31 and 32 of the 6th District 2 of Carroll County, Georgia, containing 0.33 acres, more of less, and being more particularly described as Lot 560, Section 5, Faladold Plantation, as shown on a plat entitled "Survey for Kelly R. Brothers and Vicine W. Brothers," prepared by Georgia Surveying, Inc., certified by Henry T. McBrayer, Georgia Rogistored Land Surveyor No. 2570, dated November 15, 1995, and recorded in Phil Book 55; Page 23, Carroll County Public Records. Said plat and the record thereof are each by reference incorporated herein.

TOGETHER WITH:

ALL THAT TRACT or parcel of land designed as Lot No. 519, Section No. 5 in Fairfield.

Plantation (formerly known as Treasure Lake Subdivision) in Carroll County, Georgia as it is shown and collineated on a plat of said section and subdivision appearing of record in Piet Book 12, Page 62, in the Office of the Cerk of Superior Court of Carroll County, Georgia, which plat and the record thereof are by reference incorporated herein for a more particular description of said property.

Santenum parcel (1.0 is 559 and 560) is also shown and delinested on plat of record in Plat Book 69 Page 166, apprecial recording.

STUMBER PARTY LAND

JAN 0 7 2008 Notary Public Douglas County, Georgia My Commission Expires Aug. 18, 2008 KENNETH SKINNER, CLERK

JUN 2 6 2006

RECORDED. KENNETH SKINNER, CLERK

Case 1:17-cv-02883-WSD Document 3 Filed 08/03/17 Page 22 of 23

Georgia Northern Bankruptcy CM/ECF v5.1.1 Lt...

https://ecf.ganb.uscourts.gov/cgi-bin/NoticeOfFili

United States Bankruptcy Court Northern District of Georgia

Notice of Bankruptcy Case Filing

A bankruptcy case concerning the debtor(s) listed below was filed under Chapter 13 of the United States Bankruptcy Code, entered on 05/04/2015 at 3:55 PM and filed on 05/04/2015.

Nadine Rone

PO Box 1954
Carrollton, GA 30112
SSN / ITIN: xxx-xx-5157
aka Nadine Marie Jackson
aka Nadine Marie Jackson-Rone

The bankruptcy trustee is:

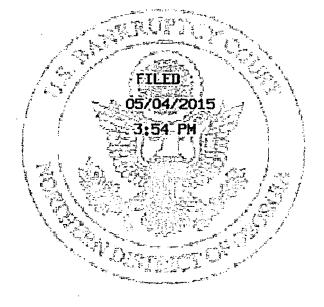
Adam M. Goodman Adam M. Goodman, 13 Trustee Suite 200 260 Peachtree Street Atlanta, GA 30303 678-510-1444

The case was assigned case number 15-10970-whd to Judge W. Homer Drake.

In most instances, the filing of the bankruptcy case automatically stays certain collection and other actions against the debtor and the debtor's property. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtor can request the court to extend or impose a stay. If you attempt to collect a debt or take other action in violation of the Bankruptcy Code, you may be penalized. Consult a lawyer to determine your rights in this case.

If you would like to view the bankruptcy petition and other documents filed by the debtor, they are available at our *Internet* home page http://ecf.ganb.uscourts.gov/index.html or at the Clerk's Office, 18 Greenville Street, Newnan, GA 30263.

You may be a creditor of the debtor. If so, you will receive an additional notice from the court setting forth important deadlines.



Case 1:17-cv-02883-WSD Document 3 Filed 08/03/17 Page 23 of 23.

Georgia Northern Bankruptcy CM/ECF v5.1.1 LI...

https://ecf.ganb.uscourts.gov/cgi-bin/NoticeOfFili

M. Regina Thomas Clerk, U.S. Bankruptcy Court